NATIONAL DIGITAL INCLUSION ALLIANCE

USF Working Group Request for Comments

Monday, September 15th, 2025

To: The Universal Service Fund Working Group (Working Group) Senators Deb Fischer, Ben Ray Luján, Shelley Moore Capito, Amy Klobuchar, Jerry Moran, Gary Peters, Dan Sullivan, and Jackie Rosen; and Representatives Richard Hudson and Doris Matsui

Re: Response of the National Digital Inclusion Alliance to the Universal Service Fund Working Group Request for Comment

Dear USF Working Group Members,

The National Digital Inclusion Alliance (NDIA) respectfully submits these comments to the Working Group as you consider the Universal Service Fund (USF)'s future. The National Digital Inclusion Alliance advances digital equity by connecting organizations, supporting community programming, and equipping policymakers to act. We work collaboratively with over 2,000 digital inclusion practitioners in all 50 states, the District of Columbia, all U.S. territories, and 47 Tribal entities. Our affiliates are community-based organizations, nonprofits, local and state governments, and many others that support individuals using technology to live, learn, work, and thrive in today's digital economy. Working collaboratively, NDIA identifies, crafts, and disseminates resources and tools to help community-based digital inclusion programs increase their impact with populations who have been left behind. While universal, the digital divide disproportionately impacts disadvantaged communities and individuals. The work and insight of these affiliates inform the following recommendations.

Discussion

Effectiveness of Programs

1. ***How should Congress evaluate the effectiveness of each USF program in achieving their respective missions to uphold universal service?***

Congress Should Require the Commission to Holistically Evaluate the USF Programs' Efficacy

To achieve universal service would mean K-12 students in rural New York are just as likely to excel as their peers in New York City. Elders in Alaskan villages can share their language and culture with future generations in new ways. An aspiring entrepreneur in Cincinnati, Ohio, can launch a successful tech startup without paying the high rents in Silicon Valley. A Veteran in a border town in Texas can bypass traveling long distances to the Veterans Affairs (VA) Hospital and see a doctor online. A senior citizen in Maine can order groceries from a website and have them delivered. And a Pacific Islander living in the 'lower 48' can stay connected with family and friends back home.

To achieve universal service, the universal service fund programs should be designed to lower, and eventually eliminate, the barriers that households, anchor institutions, and businesses face that keep them offline. If a household is offline because it is in a rural area and lacks service, a USF program should provide a solution for that barrier. Likewise, if a household is offline because the service is unaffordable, a USF program should provide a solution for that problem. And if a school, library, or hospital can't deliver critical services to its community members because it lacks an internet subscription, a USF program should provide a solution for that barrier.

The Universal Service Fund (USF) Programs should be evaluated based on their effectiveness in accomplishing their respective missions and on how well they lower the barriers to the digital divide for the end-users and primary recipients of the program funds. High-quality data collection and reporting must be the backbone of any future decision-making–to verify that funds are being efficiently allocated and to

measure program performance against Congressionally established benchmarks.

We encourage Congress to require the Commission to develop holistic measures upon which to measure the effectiveness of the USF programs, so that questions like the following can be answered:

- Have broadband subscription rates increased meaningfully amongst all demographics?
- Have the subscription rates increased meaningfully amongst target (ie, rural and low-income households) demographics?
- How many households have a fixed broadband subscription and at what speeds?
- How many households have a mobile broadband subscription and at what speeds?

In addition, we encourage Congress to require the FCC to:

- **Continuously evaluate their data collection processes** and ensure they're using standardized data systems to provide real-time reporting.
- **Publish public-facing dashboards** so that anyone can track program performance.

Congress should mandate the creation of a National Digital Opportunity Plan to measure the effectiveness of USF Programs

In 2022 and 2023, the Government Accountability Office (GAO) recommended the federal government create a national broadband strategy to synchronize federal efforts to help narrow the digital divide.[1] We support this recommendation and propose that Congress establish a National Digital Opportunity Plan as a companion plan to the national broadband strategy. A National Digital Opportunity Plan would enable the creation of digital inclusion ecosystems across the country, coordinate federal, state, local, and Tribal strategies to ensure every community can benefit from digital opportunity programs, and measure the effectiveness of USF, FCC, and other

[1] See United States Government Accountability Office, Broadband: National Strategy Needed to Guide Federal Efforts to Reduce Digital Divide (GAO, May 2022), https://www.gao.gov/assets/gao-22-104611.pdf.

federal broadband programs.[2]

Additionally, GAO noted that there is no federal strategy focused on broadband access for Tribes, even though in rural areas, about 30 percent of people who live on Tribal lands do not have broadband access, compared to 14 percent who live in non-Tribal areas.[3] We support GAO's recommendation to develop a national strategy for closing the gap in broadband access on Tribal lands as part of the broader national broadband strategy.[4] A National Digital Opportunity Plan should similarly consult with Tribal Governments to outline strategies for increasing broadband adoption, affordability, and use in Tribal communities.

The National Digital Opportunity Plan should be informed by the digital equity/opportunity plans states, territories, and the District of Columbia developed in accordance with the Digital Equity Act (DEA) codified by the Infrastructure Investment and Jobs Act.[5] This was a good idea, and we commend Congress for rightly acknowledging the importance of community-driven planning.[6] While the DEA Capacity and Competitive Grant programs were canceled, all 56 states and territories completed and published their plans before the cancellation.[7] These plans can and should inform the national plan.

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[2] See Angela Siefer, National Digital Inclusion Alliance on Closing the Digital Divide: Overseeing Federal Funds for Broadband Deployment, Subcommittee on Oversight and Investigations Committee on Energy and Commerce, United States House of Representatives, 118th Congress, (May 10, 2023), https://www.digitalinclusion.org/blog/ndia-advocates-for-digital-equity-before-house-subcommittee/

[3] "Breaking Down Barriers to Broadband Access," Government Accountability Office, August 11, 2022, https://www.gao.gov/blog/breaking-down-barriers-broadband-access

[4] "Breaking Down Barriers to Broadband Access," Government Accountability Office, August 11, 2022, https://www.gao.gov/blog/breaking-down-barriers-broadband-access

[5] Infrastructure Investment and Jobs Act, 47 USC § 1702 (2021).

[6] See National Digital Inclusion Alliance on Universal Service Fund (USF) Working Group Request for Comments, 2,3, (August 25, 2023) https://www.digitalinclusion.org/wp-content/uploads/2025/01/NDIA-Comments-to-USF-Senate-WG.pdf

[7] "Visions of Digital Equity," Benton Institute for Broadband and Society, accessed September 15, 2025, https://www.benton.org/visions-digital-equity

The rapid evolution of technology makes it clear that future digital inequalities are unavoidable. Emerging technologies such as AI cause new digital divides that require ongoing investments and research.[8] This is no longer hypothetical; all Americans, from Kindergartners to 90-year-olds, now interact with AI technologies daily and require a minimum of basic AI literacy to be able to operate in today's world.[9] Congress should consider current and future realities when assessing USF's effectiveness and determining how its distribution programs should be reformed.

A National Digital Opportunity Plan should consider this rapid technology evolution and provide a sustainable plan for this continuous change, guiding the modifications needed for the United States to compete globally. To do this, the plan should outline strategies to ensure every US community has a digital inclusion ecosystem, as research demonstrates that digital inclusion ecosystems enable ongoing, tailored support to community members for addressing current and future digital divides.[10]

A digital inclusion ecosystem combines programs and policies that meet a geographic community's unique and diverse needs. A strong digital inclusion ecosystem is coordinated and integrates programs and policies addressing all aspects of the digital divide, including affordable broadband, devices, digital skills (including AI and cybersecurity trainings), digital navigation, hardware and software technical support, and collaboration among entities providing digital inclusion services.

In addition to outlining a strategy for ensuring each community has a digital inclusion ecosystem, a National Digital Opportunity Plan should:

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[8] Danna Lorch, "America's Digital Divide: Where Workers Are Falling Behind," Harvard Business School, February 10, 2025, https://www.library.hbs.edu/working-knowledge/americas-digital-divide-where-workers-are-falling-behind

[9] Erin Mote, "Opinion: AI can be a great equalizer, but it remains out of reach for millions of Americans. We cannot let that continue," Hechinger Report, September 7, 2025, https://hechingerreport.org/opinion-ai-can-be-a-great-equalizer-but-it-remains-out-of-reach-for-millions-of-americans-we-cannot-let-that-continue/.

[10] See National Digital Inclusion Alliance on Universal Service Fund (USF) Working Group Request for Comments, 2,3, (August 25, 2023) https://www.digitalinclusion.org/wp-content/uploads/2025/01/NDIA-Comments-to-USF-Senate-WG.pdf

- Strengthen and support local, state, territory, and Tribal digital inclusion ecosystems.
- Designate a coordinating body to identify and facilitate digital inclusion work across all the federal agencies, including USF programs, and propose methods for aligning them.
- Identify federal programs that could support (through existing funding) digital skills, access to affordable internet service, and access to appropriate devices.
- Identify the cost savings federal government agencies realize by converting manual services to digital services for digital inclusion programs.
- Identify examples and best practices of public-private partnerships across industries and geographies that support local digital inclusion programs.
- Encourage the federal government to address all barriers to digital equity holistically and comprehensively.[11]

At a minimum, a National Digital Opportunity Plan should include:

1. A Vision for Digital Opportunity
2. An analysis of existing federal datasets and survey or qualitative data collected for the plan to provide a timely assessment of the current state of the digital divide across the country, including a better understanding of the barriers that keep people offline, such as:
    a. Access,
    b. Affordability of the service,
    c. Devices
    d. Digital skills,
    e. and other barriers that may inhibit a household from subscribing to and benefiting from the internet.

[11] See Angela Siefer, National Digital Inclusion Alliance on Closing the Digital Divide: Overseeing Federal Funds for Broadband Deployment, Subcommittee on Oversight and Investigations Committee on Energy and Commerce, United States House of Representatives, 118th Congress, (May 10, 2023), https://www.digitalinclusion.org/blog/ndia-advocates-for-digital-equity-before-house-subcommittee/

3. Strategies for addressing the barriers and achieving the vision.
4. Recommendations for coordinating across federal, state, local, and Tribal programs
5. Baseline data and future metrics to benchmark progress.
6. A research agenda and evaluation plan.
7. A sustainability plan to account for continuous change.

Congress Should Update Section 706 of the Telecommunications Act of 1996

The Commission's measurement and reporting of "whether advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion" has been haphazard over the years. Since Congress began requiring the FCC to create and publish the report in 1996, the Commission has rarely issued two consecutive annual reports and has only released 16 reports in 29 years. Over the years, what data is collected, how they are collected, and how it is reported have evolved. The report often contains tables of broadband deployment data by state and county. The speeds at which a state/county is considered served have been updated over time, as has the breakdown of the technologies the Commission reports on. The report also often contains broadband adoption data at various speed thresholds, sometimes broken down by state and sometimes by state and county.

Instead, in the 2024 Report, the Commission determined that due to several factors, including the findings and mandates Congress included in the Infrastructure Investment and Jobs Act (IIJA) statutory language, that the question of "whether advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion" could not be fully answered by looking at Broadband Deployment data alone.[12]

As such, the Commission outlined additional categories and subsequent metrics it should consider to determine whether it's meeting its goals. The additional categories the Commission included were: broadband availability, broadband adoption, broadband affordability, and broadband equity. In adding these categories

[12] The Federal Communications Commission, 2024 Section 706 Report. March 18, 2024. https://docs.fcc.gov/public/attachments/FCC-24-27A1.pdf

to the report, the Commission affirmed what digital inclusion practitioners and researchers have known for years--that 'whether advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion," can't be adequately measured on deployment data alone, because in the end, it matters not which technologies are available to a household if it cannot use it and benefit from the technology. The data policymakers collect and the questions they ask of that data identify their policy priorities and impact the policy and programmatic solutions design. However, the Commission and Congress cannot design commonsense solutions for solving all aspects of the digital divide without comprehensive and consistent data.

The Commission should have the flexibility to improve its data collection processes regularly, update metrics to reflect the reality on the ground better, and update the specific data it collects when needed. However, Congress should mandate the Commission update, collect, and report on a minimum number of categories, including the following, to accurately answer "whether advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion."

2. How well has each USF program fulfilled Section 254 of the Communications Act of 1996?

In Section 254 of the Communications Act of 1996, Congress outlined the following seven principles of Universal Service, "for the preservation and advancement of universal service":

1. Quality and Rates
2. Access to Advanced Services
3. Access in Rural and High-Cost Areas
4. Equitable and Non-Discriminatory Contributions
5. Specific and Predictable Support Mechanisms
6. Access to Advanced Telecommunications Services for Schools, Health Care, and Libraries

7. Additional Priorities (as determined by the joint board and commission)[13]

Connectivity is a cornerstone of modern life. It enables access to healthcare, education, employment, financial services, commerce, government programs, emergency response, and countless other essential functions. All the USF programs–the Lifeline Program, E-Rate Program, the Rural Health Care Program, and the High Cost Program–have made progress toward fulfilling the USF's seven principles. However, the programs neither collectively nor individually completely fulfill Section 254 of the Communications Act of 1996. We have not reached a state of 'universal service,' in fact, too many Americans are left offline.

The Lifeline Program addresses this challenge by making connectivity more affordable. In every state, affordability is the leading reason households remain offline, making Lifeline one of the FCC's most important tools to close the digital divide. However, as telecommunications services and how Americans use them have changed over the years, the Lifeline program has not kept pace with the needs of low-income households and what it takes to communicate meaningfully in the 21st century. The program's efficacy is severely limited by its benefit amount and the administrative red tape built up over time.

The E-Rate and rural healthcare programs have significantly impacted the ability of schools, libraries, and healthcare institutions to connect to the Internet so they can better deliver their essential services. Yet, if households are unable to interact with the online services these organizations offer, the potential impacts are not fully realized.

3. Has the FCC adequately assessed each USF program against consistent metrics for performance and advancement of universal service?

NDIA reiterates that Congress must update Section 706 of the Telecommunications Act of 1996. The Commission's measurement and reporting of the deployment of advanced telecommunications capability to Americans has been

[13]Telecommunications Act of 1996, 47 U.S.C. § 254(b)(1)-(7) (1996).

inconsistent since Congress mandated it in 1996. The data collected, reporting, and data collection methods have evolved, resulting in inconsistent data being collected year-to-year. Additionally, the Commission and Congress need comprehensive data to effectively address the digital divide, including broadband deployment, broadband affordability, and other broadband adoption barriers. Detailed, household-level broadband data is essential for improving broadband policies and directing funding to close gaps in unserved and underserved communities.[14] The Commission should regularly enhance its data collection and update metrics. However, Congress must require the Commission to collect and report on essential categories to assess whether advanced telecommunications capabilities are achieving universal service.

In addition, we encourage Congress to require the FCC to:

- **Continuously evaluate their data collection processes** and ensure they use standardized data systems to provide real-time reporting.
- **Publish public-facing dashboards** so that anyone can track program performance.

Consideration of Reforms

1. ***What reforms within the four existing USF programs would most improve their: Transparency, Accountability, Cost-effectiveness, Administration, and Role supporting universal service?***

   Congress should create a new Broadband Affordability Benefit Program funded through USF, including data, voice, and text services.

Modern communication requires access to voice, text, and data. Research has repeatedly demonstrated that the cost of a mobile and home broadband subscription is the most significant barrier to households' ability to get and stay connected. Yet, the current Lifeline program is insufficient to enable low-income households to access voice, text, and data services without interruption.

[14] Comments of Public Knowledge, UnidosUS, National Digital Inclusion Alliance, Asian Americans Advancing Justice | AAJC, New America's Open Technology Institute, and X-Lab, GN Docket No. 25-223, Federal Communications Commission, 2025.https://www.fcc.gov/ecfs/search/search-filings/filing/10909619211183

As such, Congress should strengthen and expand the current Lifeline program ***to create a new broadband affordability benefit program that meets the modern connectivity needs of low-income households***. The new broadband affordability benefit program should not be a direct replica of the Affordable Connectivity Program (ACP) or the Lifeline program, but should incorporate the successful facets of both programs. The program should be more accessible and flexible while preserving integrity and reducing administrative burdens on the FCC and the consumer.

The new broadband affordability program should:

- Cover Voice, Text, and Data
- Be applicable to mobile and/or home broadband services
- Be a minimum of $40/month for non-Tribal Households, and $110/month for Tribal Households
- Be applicable to all plans ISPs offer
- Be available to low-income households through a variety of eligibility pathways
- Provide a simple, user-friendly application process
- Include Consumer Protections
- Simplify ETC requirements for participating ISPs
- Provide grants for community-based organizations, state, and local governments to support program outreach and enrollment

Mobile and Home Service: Why Voice, Text, and Data are Necessary

Universal service goals must account for evolving communications technology AND continue to support core communications services, such as voice and text. Current Lifeline subscribers report that all three services are equally important to them.[15] Traditional phone service (voice) remains critical for access to emergency

[15] National Lifeline Association (NaLA), "Annual Consumer Survey," January 31, 2025, https://eqm2782zctq.exactdn.com/wp-content/uploads/2025/01/NaLA-Annual-Consumer-Survey-CORRECTED-1.31.25.pdf.

services, work activities, and social connections.[16] Text capabilities remain an essential communication tool for a variety of reasons, including basic communication for people living with disabilities and emergency responses during crises like natural disasters, mass emergencies, and violent threats.[17] Finally, as applications require more data and bandwidth, the need for high-speed broadband with no to limited data caps or bandwidth constraints is consistently rising.

Both mobile and home broadband services are essential for households to be able to fully participate in everyday modern life. They are complementary technologies and are not interchangeable. Mobile broadband plans often have data caps or bandwidth limits that inhibit performance, but provide connectivity in and outside one's home. Home broadband subscriptions allow an individual to complete more complex tasks when paired with a laptop or desktop, including data analysis using spreadsheets or other statistical software, graphic design, or applying for jobs.[18]

As such, the new broadband affordability benefit program should enable households to subscribe to mobile and home broadband services and all the plans that fall under these service types. For instance, the program should continue to provide support for voice-only phone service as many vulnerable populations–especially seniors and those in rural areas–continue to rely on traditional voice services for essential communication, including access to emergency services.[19]

For many years, the Lifeline program focused on providing access to voice and text, but in 2016, it was updated to make broadband an allowable expense.[20] Yet, at

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[16] Broadband Connects America, *In the Matter of Report on the Future of the Universal Service Fund*, February 17, 2022.
[17] Federal Communications Commission, "What You Need to Know About Text-to-911," last reviewed March 10, 2023, https://www.fcc.gov/consumers/guides/what-you-need-know-about-text-911.
[18] Colby Humphrey, Elizabeth A. Mack, and John B. Horrigan, "Moving toward a continuum model of broadband affordability for low-income households," *Telecommunications Policy* (2025), https://doi.org/10.1016/j.telpol.2025.103027.
[19] The Lifeline Coalition in the Matter of the Delete, Delete, Delete Proceeding, 2, 3, (Apr 14, 2025), https://www.fcc.gov/ecfs/search/search-filings/filing/1041132694658
[20] In the Matter of Lifeline and Link Up Reform and Modernization, adopted March 31, 2016, available at https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf

$9.25 a month, the benefit is limited in its ability to support a home broadband connection financially, given that households report paying an average of $67 per month for home service.[21] The current $9.25 monthly benefit was set decades ago and has not been adjusted to reflect modern broadband prices nor been indexed to account for inflation.

ACP closed broadband service gaps for 23,269,550 enrolled households in both rural and urban communities, enabling consistent connectivity and facilitating consistent access to education, healthcare, job applications, and work.[22] ACP was popular because it worked. The program received bipartisan support and helped seniors like Phyllis[23] - a 78-year-old retired federal government worker living in rural Pennsylvania - and veterans like Walter[24], who served in Iraq and now lives in rural Texas- get and stay connected.

The cost of an affordability benefit program is minimal compared to the productivity and economic benefits that access to affordable broadband provides.[25] The Brattle Group found that affordable broadband access, as provided during ACP, resulted in estimated healthcare savings of approximately $28.9 to $29.5 billion through increased telehealth visits alone.[26] These savings more than cover the costs of the program.[27] They also found access to affordable broadband improved K-12 students' academic performance (which has been tied to higher lifetime earnings),

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[21] Colby Humphrey, Elizabeth A. Mack, and John B. Horrigan, "Moving toward a continuum model of broadband affordability for low-income households," *Telecommunications Policy* (2025), https://doi.org/10.1016/j.telpol.2025.103027.
[22] Federal Communications Commission, Measuring the Impact of the Affordable Connectivity Program: Survey Fact Sheet (Washington, D.C.: Federal Communications Commission, 2024),https://www.fcc.gov/acp-survey; Universal Service Administrative Company, "ACP Enrollment and Claims Tracker," USAC, accessed September 14, 2025, https://www.usac.org/about/affordable-connectivity-program/acp-enrollment-and-claims-tracker/.
[23] The National Digital Inclusion Alliance. "Phyllis Is Online with ACP and Is Advocating for More Older Adults," Jan 3, 2024. https://youtu.be/ElkVJb_sCKI?si=okHQxgO6Tsb4nnkj
[24] The National Digital Inclusion Alliance. "Walter's Online with ACP, & He's Connecting More Texas Veterans," Jan 4, 2024. https://youtu.be/9ZRVo6e1gO0?si=YJ3fiLBeGKAGOFWM
[25] Blair Levin, "Ten Things About ACP that Ted Cruz Cares About," Benton Institute for Broadband and Society, June 5, 2024, https://www.benton.org/blog/ten-things-about-acp-ted-cruz-cares-about-2-economic-benefit-acp-health-care-system
[26] The Brattle Group, Paying for Itself: How the Affordable Connectivity Program Delivers More Than It Costs, by Coleman Bazelon, Paroma Sanyal, and Yong Paek, February 19, 2025, 18.
[27] Ibid

and increased labor force participation through greater connectivity, flexibility, and access to opportunities.[28] ACP also improved the business case for investing in rural areas,[29] reduced broadband service cancellations, and increased the likelihood that service providers will achieve a reliable return on investment from networks deployed through BEAD.[30]

Subsidy Amount

The primary goal of the new broadband affordability benefit should be to address *broadband affordability*, not broadband adoption. Low-income households are often subscription vulnerable, meaning last month they may have been able to afford a home broadband subscription, but this month they had to cancel the service to be able to afford another high-priority item in their budget.[31] Indeed, when the FCC surveyed ACP participants in December 2023, 68 percent reported that they had inconsistent or no connectivity before ACP, primarily because of the subscription cost. Other barriers, such as a lack of a device or access to a provider, also keep households offline and require separate but complementary interventions to address. As such, the new program should be explicitly designed to address broadband affordability, ensuring households whose primary barrier to broadband adoption is affordability can get and stay online.

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[28] The Brattle Group, Paying for Itself: How the Affordable Connectivity Program Delivers More Than It Costs, by Coleman Bazelon, Paroma Sanyal, and Yong Paek, February 19, 2025, 24, 29.
[29] See Blair Levin, "Washington may be about to take a giant step backward in closing the digital divide" (blog), Brookings Institution, March 13, 2023, https://www.brookings.edu/blog/the-avenue/2023/03/13/washington-may-be-about-to-take-a-giant-step-backward-in-closing-the-digital-divide/
[30] See Common Sense Media, Closing the Digital Divide Benefits Everyone, Not Just the Disconnected: An analysis of how universal connectivity benefits education, health care, government services, and employment (Common Sense Media; Boston Consulting Group, 2022) at 29-32, available at https://www.commonsensemedia.org/sites/default/files/research/report/2022-cs-bcg-closing-digital-divide_final-release-3-for-web.pdf
[31] Angela Siefer, Blair Levin, and John B. Horrigan, "Ending the ACP will Limit the Internet's Economic and Healthcare Benefits for Low-Income Households," Benton Institute for Broadband & Society, January 25, 2024, https://www.benton.org/blog/ending-acp-will-limit-internet-economic-and-healthcare-benefits-low-income-households.

Congress should consider and weigh the advantages and disadvantages of multiple options for structuring the new broadband affordability benefit program. The two primary structures NDIA suggests Congress consider are 1) a sliding scale and 2) a fixed dollar amount.

A sliding scale benefit would meet the individual household's needs rather than apply a fixed benefit amount to each household's bill. The benefit amount could be based on a combination of 1) the household's annual income / the percent of the federal poverty level (FPL) the annual household's income falls into, 2) household size, and 3) an agreed-upon affordability threshold, such as two percent of household income or a similar threshold. A sliding scale structure would be more efficient in that the benefit would target a larger benefit to very low-income people, with a less generous benefit for those not in severe poverty. However, this approach would be more difficult and complex to implement, and in all likelihood be more burdensome on the consumer to demonstrate their income and other information necessary to ensure the benefit is calculated correctly. Several other federal benefit programs have implemented a sliding scale structure including LIHEAP[32] and SNAP[33]. We encourage Congress to investigate these programs' models to determine if a similar model is preferable for the new broadband affordability benefit program.

The second option is a fixed dollar amount, where each household receives the same benefit amount, no matter their income or household size, similar to the current Lifeline program and the previous ACP program.

If Congress adopts this model, NDIA recommends Congress should establish a benefit floor of $40/month for non-Tribal households and $110 per month if the subscriber resides on Tribal Lands. These figures are derived from combining the current Lifeline benefit amount with the amount offered during the ACP program, so a household can afford mobile and home internet subscriptions with the new benefit. There is no universally agreed upon dollar amount that constitutes as "affordable."

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[32] U.S. Department of Health and Human Services, Office of Community Services, LIHEAP Clearinghouse, "LIHEAP Income Eligibility for States and Territories," accessed September 15, 2025, https://liheapch.acf.gov/delivery/income_eligibility.htm.
[33] U.S. Department of Agriculture, Food and Nutrition Service, "SNAP Eligibility," last reviewed August 29, 2025, https://www.fns.usda.gov/snap/recipient/eligibility.

What is affordable to one household is not to another. However, when averaging the responses from a 2021 survey of low-income households, $40 could adequately support roughly 50% of surveyed low-income households' expressed needs[34]. That said, Congress should further evaluate the available research and task economists and researchers to determine the benefit amount that would support the highest percentage of low-income households, particularly in light of the inflation the American economy has experienced since the study was conducted.

In addition, regardless of the model it adopts, Congress should mandate the FCC regularly reassess the benefit amount for the new broadband affordability program to ensure it adequately meets modern connectivity requirements. Simply indexing the new benefit to inflation is insufficient for today's broadband needs. For example, the Lifeline program was originally designed for voice services, which are significantly cheaper than broadband. Therefore, while indexing the benefit to inflation is necessary, it is not sufficient. A fixed dollar amount will inevitably become disconnected from market realities and consumer needs. Merely adjusting the fund for inflation makes sense only if "universal service" is regarded as a static goal, yet research indicates that both consumer needs and technology are continually evolving.

Households should also be able to easily split the benefit if they choose to do so. For instance, they should be able to allocate $20 to their home subscription and $20 to their mobile subscription if that is their preference. Additionally, Congress should explore allowing multiple benefits for qualifying households, such as those with parents and school-aged children who need to communicate while in separate locations.

[34] EveryoneOn and John B. Horrigan. "Affordability and the Digital Divide: The First in a 3-Part Series on Digital Connectivity During the Pandemic," Dec 2021. https://static1.squarespace.com/static/5aa8af1fc3c16a54bcbb0415/t/61ad7722de56262d89e76c94/1638758180025/EveryoneOn+Report+on+Affordability+%26+the+Digital+Divide+2021.pdf

Eligibility

NDIA recommends that Congress should establish the following benchmarks for eligibility and solely use the National Verifier to verify applicant eligibility:

- If at least one member of the household meets the following criteria or participates in one of the following government programs:
  - Has an income that is at or below 200% of the Federal Poverty Guideline,
  - Participates in any of these federal programs: SNAP, Medicaid, WIC, SSI, Federal Public Housing Assistance, Veterans Pension and Survivors Benefit, Free and reduced lunch program or school breakfast program,
  - Have received a Federal Pell Grant in the current award year,
  - Is currently receiving a Lifeline Benefit
  - Tribal Eligibility Criteria
    - Live on qualifying Tribal Lands,
    - Income at or Below 200% of the Federal Poverty Guideline, or
    - Participate in any of the above programs and Bureau of Indian Affairs General Assistance, Head Start, Tribal TANF, or Food Distribution Program on Indian Reservation

Table 1 provides an overview of the eligibility qualifiers we suggest, the associated federal poverty level, and how the benefit is determined.

Table 1: New Broadband Affordability Benefit Qualifiers

Qualifier	Federal Poverty Level	Other Income Evaluation	Asset Evaluation	Additional Considerations	State or Tribal Qualifier	Other
Household Income at or below 200% FPL	200%	N	N	N	N	
Federal Pell Grant	N/A	Y	Unclear	Y	N	
Free & Reduced Lunch	Free lunch 130% Reduced Lunch 180%	N	N	Y	N	CEP identified student percentage of 25%

WIC	100-185%	N	N	Y	Y	Qualified to participate in certain programs
Lifeline	135%	N	N	Y	N	Qualified to participate in certain programs
Tribal Assistance Programs	135%	N/A	N/A	Y	Y	Qualified to participate in certain programs
Medicaid	138% using Modified Adjusted Gross Income (MAGI)	Y	N/A	Y	Y	Mandatory eligibility groups
SNAP[35]	Gross Monthly Income 130% Net Monthly Income 100%	N	N	N	Y	Elderly or a person with a disability
Social Security Income	N/A	Y	Y	Y	N	A person with a disability, blindness, or 65+
Federal Public Housing Assistance	N/A	Median Income for State or County	N	Y	Y	Elderly, a person with a disability, or as a family. US citizenship or immigration status.
Veterans and Survivors Pension Benefit	N/A	Y	Y	Y	N	
Tribal Programs for Households	N/A	N/A	N/A	N/A	Y	

[35] https://www.fns.usda.gov/snap/recipient/eligibility

on Qualifying Tribal Lands						
Bureau of Indian Affairs General Assistance	N/A	N/A	N/A	Y	Y	
Tribal Temporary Assistance for Needy Families (TANF)	N/A	N/A	N/A	N/A	Y	
Tribal Head Start	N/A	Y	N/A	N/A	Y	
Food Distribution Programs on Indian Lands	N/A	Y	N/A	N/A	Y	

Consumer Protections

NDIA urges Congress to incorporate consumer protections and enforcement mechanisms for violating the stated protections in the new broadband affordability program. Congress should include the following protections for consumers:

- No early termination fees
- Eliminate credit checks
- Arrearages are not a barrier to service
- No mandatory waiting period
- Credit check can't be used as a condition of enrollment, to limit service to a particular product or to refuse to transfer the service.

- Same terms and conditions as everyone else (i.e. customers not receiving the benefit)
- No disconnections for nonpayment for 90 days
- Upselling prohibitions
- Can't restrict service offerings (customer can apply benefit to whatever product they want (unless they fall behind and are at risk of disconnection)
- Can't restrict transferring to another provider
- No unfair, deceptive, abusive practices
- Clear and easy-to-understand disclosures about program rules, including the complaint process
- No data caps, surcharges, or usage-based throttling
- No installation and hardware/equipment charges

Establish a Consumer Outreach and Enrollment Support Grant Program

NDIA's affiliates supported ACP implementation from start to end. Immediately after its enactment, often with little or no funding, NDIA affiliates promoted the program to their constituents. They guided their clients through the enrollment process, assisted them in overcoming any challenges related to enrollment, and, when the program expired, helped their constituents understand what alternative options were available, if any.[36]

Through USF, Congress should establish a grant program to enable outreach and enrollment efforts in the new broadband affordability benefit program. In addition to supporting outreach and enrollment, such a program would educate consumers regarding predatory sales tactics and misinformation, facilitate customer choice, and provide outreach neutrality. This program should also ensure that information about a

[36] Amy Huffman, "The Affordable Connectivity Program is Popular because it Works," National Digital Inclusion Alliance (blog), April 22, 2024, https://www.digitalinclusion.org/blog/the-affordable-connectivity-program-is-popular-because-it-works/

new broadband affordability benefit program is widely disseminated and facilitates enrollment.

NDIA also urges Congress to require grantees to demonstrate a proven track record of effectively serving their community.[37] These organizations can conduct grant-funded activities impartially, as they are not vested in the applicants' choices. Grantees who provide digital inclusion programming possess valuable information about low-cost internet options that can help community members maintain connectivity and access devices and digital skill training.

Congress should require the Commission to support these grantees so they can successfully market, inform, and enroll participants in the new broadband affordability benefit program. Similar to the Your Home Your Internet and ACP Navigator pilot programs, Congress should require the Universal Service Administrative Company (USAC) to grant access to the National Verifier for approved grantees who meet established requirements, which will help assist eligible Lifeline participants with the application process.[38]

NDIA's affiliates have found that the most successful outreach and enrollment strategies for broadband benefit programs are high-touch, time-intensive, personalized, and require a lot of staff time to conduct. For example, one NDIA affiliate registered over 600 households for the EBB through street teams. The teams comprised 12 people, two coordinators, and 10 supporting people. While this effort was fruitful, it was time-consuming, labor-intensive, and costly. This is an example of a local outreach effort necessary for reaching and providing enrollment support to eligible households.[39]

The grant program should be structured so that its application process, reporting requirements, and financial requirements are as unburdensome to subgrantees as possible. Wherever possible, Congress should provide additional

[37] National Digital Inclusion Alliance on the Implementation of the Affordable Connectivity Program (Dec. 9, 2021), https://www.fcc.gov/ecfs/search/search-filings/filing/1031637767104
[38] Your Home, Your internet Third Report and Order, 87 FR 54401, 12-14, (September 6, 2022).
[39] National Digital Inclusion Alliance on the Implementation of the Affordable Connectivity Program (Dec. 9, 2021), https://www.fcc.gov/ecfs/search/search-filings/filing/1031637767104

support for small organizations that are trusted in their communities but have limited capacity to participate in large, federal grant programs.[40]

NDIA recommends that the grants provide a portion of the funding to the awardees up front, because a reimbursement process that requires a small organization to provide all resources up front would prohibit many organizations with limited resources from participating. The grant award should be a minimum of $50,000, as the application and administration of the grant for a smaller award would inhibit small organizations with limited resources from participating due to the outsized administrative cost. The grant term should be at least two years to limit the administrative burden for the CBO. [41]

In addition, Congress should require the FCC to create shared resources for grantees including but not limited to: program trainings, toolkits with shared language for informational and educational materials that simply describe the program in a multitude of languages, and other outreach materials.[42]

Lastly, previous outreach grants provide a solid foundation for developing new outreach grant initiatives. Acknowledging that individual ISP offerings may not suit every consumer is essential. These grants demonstrate a neutral approach, ensuring consumers are not steered toward specific products. In line with the ACP Outreach Grant Program Notice of Funding Opportunity, NDIA recommends grantees maintain neutrality of grant-funded outreach activities and prohibit service provider in-kind contributions and commissions or compensation linked to program applications or enrollment.[43]

[40] National Digital Inclusion Alliance on the Implementation of the Affordable Connectivity Program (Dec. 9, 2021), https://www.fcc.gov/ecfs/search/search-filings/filing/1031637767104
[41] National Digital Inclusion Alliance on the Implementation of the Affordable Connectivity Program (Dec. 9, 2021), https://www.fcc.gov/ecfs/search/search-filings/filing/1031637767104
[42] Universal Service Administrative Company, "Advertise Lifeline", USAC, Accessed September 12, 2025, https://www.usac.org/lifeline/rules-and-requirements/advertise-lifeline/
[43] Federal Communications Commission/Consumer and Governmental Affairs Bureau, Notice of Funding Opportunity: Affordable Connectivity Outreach Grant Program, FCC-ACOGP-23-001 (32.011)

E-Rate

Some policies, such as permitting schools and libraries to extend the reach of their services to students and patrons beyond the walls of their buildings via hotspots or WiFi on school buses, are common-sense policies that Congress should include as eligible uses for E-Rate funds. These types of programs allow districts and libraries, which understand the needs of their constituents, to serve them better.

E-Rate is the largest federal educational technology program in the United States. It has enabled schools and libraries to acquire the broadband services necessary for students and library patrons to achieve their educational goals and access information.[44] The program ensures that the tens of thousands of schools and libraries in both rural and urban areas, as well as those in wealthy and underserved communities, can provide all students and patrons with access to high-speed internet.[45]

The FCC has modernized the E-Rate program to align with changing technology and broadband needs for schools and libraries, and ensure K-12 students and library patrons benefit from high-speed connectivity wherever they are. In 2023, the FCC adopted a Declaratory Ruling that clarified E-Rate support is eligible for Wi-Fi on school buses.[46] In 2024, the FCC approved support for lending hotspots through schools and libraries via the E-Rate program.[47] Schools, Health, and Libraries Broadband Coalition (SHLB) has expressed support for the hotspot lending program, emphasizing its importance for students who lack reliable internet access at home for completing online assignments and improving connectivity for those with long

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[44] Each year, Funds for Learning conducts a survey of school and library applicants to gather feedback about the E-Rate program. Of those that responded to the 2024 survey, the majority "reaffirmed that E-rate funding is crucial for schools and libraries" and that E-Rate "ensures equitable access to the internet and essential technology, helping bridge the digital divide, especially for rural and underserved communities." Funds for Learning, *2024 E-rate Trends Report*, 11 (2024) (*FFL 2024 Trends Report*), *available at* https://www.fundsforlearning.com/e-rate-data/trendsreport/.

[45] *2024 Monitoring Report* at 58, Table 4.3. This figure does not include the consortia figure, which is separately represented in the report; Public Library Association, *2023 Public Library Technology Survey: Summary Report*. Chicago: Public Library Association, 1 (2024) https://www.ala.org/sites/default/files/2024-07/PLA_Tech_Survey_Report_2024.pdf.

[46] *Modernizing the E-Rate Program for Schools and Libraries*, Declaratory Ruling, 38 FCC Rcd 9943 (2023); *Addressing the Homework Gap through the E-Rate Program*, WC Docket No. 21-31, Report and Order and Further Notice of Proposed Rulemaking, FCC 24-76 (rel. Jul. 29, 2024).

[47] *FCC Approves Rules to Support Wi-Fi Hotspots Through E-Rate Program,*

commutes or participating in class trips.[48] NDIA agrees with SHLB's perspective, highlighting the necessity of such a program to enhance remote learning participation, especially without a sufficient federal broadband affordability initiative supporting home access. Unfortunately, the school bus WiFi and hotspot lending programs are at risk of being overturned by the FCC,[49] potentially widening the persistent Homework Gap.[50] As such, Congress should express its clear intent and include hotspot lending in schools and libraries, funding for WiFi on school buses, and other equivalent services as eligible uses of E-Rate.

High Cost Program

Congress should require that any ISP or telecommunications provider that receives support through the high-cost program also offer a low-cost plan to low-income subscribers in its USF-funded footprint. NDIA created a low-cost plan model in 2024 that providers can leverage to base their low-cost plan upon.[51]

2. What reforms would ensure that the USF contribution factor is sufficient to preserve universal service?

Any reforms Congress makes to the USF contribution factor should be driven by the reforms needed to reach the universal service goals. That is, contribution reform should be driven by distribution reform, not vice versa.

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[48] *See generally* Comments of SHLB, *Modernizing the E-Rate Program for Schools and Libraries*, WC Docket No. 13-184 (filed Nov. 30, 2023); *See generally* Comments of SHLB and the Open Technology Institute at New America (OTI), *Addressing the Homework Gap Through the E-Rate Program*, WC Docket No. 21-31 (filed Jan. 17, 2024) (*SHLB and OTI Hotspot Comments*).
[49] Carr Proposals Would End FCC's Unlawful Biden-Era Expansion of COVID Spending Program, News Release (Sept. 3, 2025) https://docs.fcc.gov/public/attachments/DOC-414268A1.pdf. Specifically, the Commission is considering voting on both a declaratory ruling that would overturn school bus Wi-Fi and an order on reconsideration that would reverse the hotspot lending program.
[50] Lauraine Langreo, "The 'Homework Gap' Persists. Tech Equity Is One Big Reason Why," Education Week, June 07, 2022, https://www.edweek.org/technology/the-homework-gap-persists-tech-equity-is-one-big-reason-why/2022/06
[51] National Digital Inclusion Alliance, "Low-Cost Plan Model," March 13, 2024, https://www.digitalinclusion.org/resource/low-cost-plan-model/.

We urge Congress to reform the contribution system to include a broader base of funds that includes services and entities that benefit from this ubiquitous broadband ecosystem. This could include incorporating revenue from the Broadband Internet Access Service (BIAS), large technology or social media companies, and edge providers into the contribution factor pool. Congress should consider all options.

Contributions to USF should come from multiple sources to reduce the fee amount assessed for any one service. Adding new contributors to the fund may be difficult, but it would reduce the contribution rate each contributor is responsible for. Congress should use the following criteria to determine which sources to assess:

- Are for-profit entities that benefit from the Universal Service Programs,
- Currently have data upon which to assess the fee, and
- Do not pass the fee on to low-income households.

Congress should enact protections for low-income consumers, such as ensuring that households that are beneficiaries of the Lifeline program and/or the new affordable broadband benefit program are exempt from any fees providers pass to consumers to fulfill their obligations.

Lastly, we urge Congress not to change the USF's funding source to annual Congressional appropriations to ensure the fund remains stable, sustainable, and predictable for the millions of Americans and communities who rely on the programs.

3. What reforms would reduce waste, fraud, and abuse in each of the four USF programs?

Reducing Waste, Fraud, and Abuse in the Lifeline Program

In this section, we outline suggested reforms to the current Lifeline Program. Should Congress create such a benefit program, all suggestions should apply to the new broadband affordability benefit program.

The Q Link Lifeline case in 2025, the Armstrong Group's High-Cost Program case in 2024, and the 2022 San Francisco Whistleblower are just a few of the cases that

illustrate that ISPs, not households, are the primary entities engaging in fraud and abuse within USF programs.[52] As protective measures are implemented, it is crucial to safeguard consumers against unscrupulous ISPs.

Stop Predatory Practices in Lifeline Enrollment

The FCC protects Lifeline consumers from predatory practices by prohibiting ECTs from offering or providing enrollment representatives or their direct supervisors any commission compensation based on the number of consumers who apply for or are enrolled in the Lifeline program with that eligible telecommunications carrier (ETC).[53] Individuals enrolling people in the Lifeline program are often referred to as enrollment representatives, Lifeline Representatives, or Lifeline Agents. To help prevent waste, fraud, and abuse, eligible ETCs must require enrollment representatives to register with USAC.[54] For this purpose, USAC maintains and manages the Representative Accountability Database (RAD).

RAD validates the identities of service provider representatives performing transactions in the National Lifeline Accountability Database (NLAD) and the National Verifier.[55] Individuals that are required to register for a Representative ID in the RAD system include: individuals directly interfacing with potential subscribers to enroll them in Lifeline, immediate supervisors of individuals directly interacting with potential subscribers to complete Lifeline enrollments, individuals that contract

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[52] Ingrid Evans, "San Francisco Whistleblower Attorney: Wireless Carrier Pays $13.4 Million to Settle False Claims Relating To FCC's Lifeline Program," Evans Law, May 9, 2022, https://www.evanslaw.com/san-francisco-whistleblower-attorney-wireless-carrier-pays-13-4-million-to-settle-false-claims-relating-to-fccs-lifeline-program/ ; "Q Link Wireless LLC and Issa Asad to Pay More than $110M in Global Resolution to Resolve Criminal Charges and False Claims Act Allegations," Office of Public Affairs, U.S. Department of Justice, July 28, 2025, https://www.justice.gov/opa/pr/q-link-wireless-llc-and-issa-asad-pay-more-110m-global-resolution-resolve-criminal-charges ; "Armstrong Group Agrees to Pay $6.5M to Settle False Claims Act Allegations Relating to Subsidies Under the Federal Communications Commission's High-Cost Program, "Armstrong Group Agrees to Pay $6.5M to Settle False Claims Act Allegations Relating to Subsidies Under the Federal Communications Commission's High-Cost Program," Office of Public Affairs, Archives, U.S. Department of Justice, July 12, 2024, https://www.justice.gov/archives/opa/pr/armstrong-group-agrees-pay-65m-settle-false-claims-act-allegations-relating-subsidies-under

[53] 47 CFR § 54.406(b) (2019)

[54] 47 CFR 54.406 (a)(1)

[55] Universal Service Administrative Company, "Representative Accountability Database (RAD)," accessed September 15, 2025, https://www.usac.org/lifeline/rad/ https://www.usac.org/lifeline/rad/

directly with ETCs and oversee or manage a team of people working to complete Lifeline enrollments (Master Agent), individuals that either assist subscribers with recertification or prepare subscriber information for recertification and submission to the National Verifier or NLAD, and customer service representatives that update Personally Identifiable Information (PII) for existing Lifeline subscribers.[56]

Despite these protections, NDIA affiliates have identified problematic activities that some Lifeline Representatives engage in while signing up qualified individuals for Lifeline. Many ETCs offer free phones or tablets directly to consumers at enrollment, usually requiring no payment. However, the Lifeline program only provides subsidies for service, meaning that providers (and in some instances states) incur the cost of the devices. Some Lifeline Agents entice customers with free cell phones as part of an introductory offer, resulting in new or increased monthly fees that Lifeline applicants may not fully understand or expect.

Affiliates have reported cases where participants in the Lifeline program received inoperable cell phones or had technical issues with devices they received at pop-up events or temporary sign-up locations. When there is no customer support for the devices (which is the common scenario) , these participants lack a direct way to repair their devices or seek assistance. NDIA was able to locate several job postings for Lifeline Agents or Independent Contractors to enroll qualified individuals in Lifeline. The postings included descriptions of compensation as no caps on commissions, granting the applicant the ability to maximize their earnings based on their efforts,[57] unlimited earning potential with the option to select desired on-site location(s),[58] and monthly bonuses with uncapped income.[59] These activities may or may not violate the rules of the program, but are certainly not supporting a system in which the needs of the program participants are prioritized.

Additionally, the Office of Inspector General Federal Commissions

[56] Universal Service Administrative Company, "Representative Accountability Database (RAD)," accessed September 15, 2025, https://www.usac.org/lifeline/rad/
[57] Lifeline Agent, enTouch Wireless, accessed September 15, 2025, https://entouchwireless.com/agent-application/
[58] Independent Contractors, StandUp Wireless, accessed September 15, 2025, https://standupwireless.com/careers/contractors/
[59] Hiring Lifeline Field Agents & Managers, Executive Marketing Group, accessed September 15, 2025, https://www.lifelinewirelessjobs.com/

Communication (OIG) found that many providers failed to register all their enrollment representatives or report their enrollment activity in RAD, resulting in the FCC's inability to hold them accountable for following the rules of the program.[60] In modernizing the USF, Congress should take these challenges into account and implement additional protections to ensure that qualified Lifeline applicants are well-informed, have choices, and can easily enroll in the program. NDIA supports OIG's recommendation to enforce program rules that require ETCs to timely and accurately register all enrollment representatives in RAD and report their enrollment activity.[61] Without compliance, NDIA urges Congress to investigate alleged misconduct.

4. What actions would improve coordination and efficiency among USF programs and other FCC programs, as well as broadband programs housed at other federal agencies?

Continuation and Expansion of Interagency Collaboration and Information Sharing

NDIA applauds the initiative of the NTIA, FCC, USDA, and Treasury's interagency collaboration and information data sharing around the collection and reporting of data and metrics relating to broadband, as outlined in the Broadband Interagency Coordination Act of 2020 and the subsequent Memorandum of Understanding Regarding Information Sharing of 2024.[62] This initiative has established standards for collecting, sharing, and publicly disseminating information regarding federal broadband grant programs and paved the way for coordinated efforts among agencies that manage federally funded broadband and digital equity grant programs.

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[60] Office of Inspector General, Federal Communications Commission, Open Recommendations from FCC OIG Investigations (Washington, DC: Federal Communications Commission, March 31, 2025), https://www.oversight.gov/sites/default/files/documents/reports/2025-04/Open%20Recommendations%20from%20FCC%20OIG%20Investigations_508%20(FINAL).pdf.

[61] Office of Inspector General, Federal Communications Commission, Open Recommendations from FCC OIG Investigations (Washington, DC: Federal Communications Commission, March 31, 2025), 9, https://www.oversight.gov/sites/default/files/documents/reports/2025-04/Open%20Recommendations%20from%20FCC%20OIG%20Investigations_508%20(FINAL).pdf.

[62] Broadband Interagency Coordination Act of 2020, Contracts, 47 U.S.C. § 1308 (2020); Memorandum of Understanding Regarding Information Sharing, May 9, 2024, between the Federal Communications Commission, U.S. Department of Agriculture, National Telecommunications and Information Administration of the U.S. Department of Commerce, and the U.S. Department of the Treasury.

NDIA recommends continuing and expanding federal interagency coordination and information sharing practices and publicly disseminating information about federal broadband and digital equity grant programs to create effective and efficient programs and policies that address participants' needs and simplify processes.

Additionally, NDIA commends USAC's 2024 enhancements to improve the National Verifier to verify eligibility for the Lifeline program. USAC partnered with officials to leverage 26 state and territory database connections, providing an automated check for participation in SNAP in each state and checks of Medicaid and Supplemental Security Income, where available.[63] Congress should expand this program to every state and territory for the Lifeline program and institute similar practices in the new broadband affordability benefit program if it is established.

The National Verifier is currently connected with three federal agencies, however it could be connected to several more databases to streamline the application process.[64] We urge Congress to identify and facilitate the appropriate data matching agreements as part of USF modernization.[65]

If the National Verifier is connected to all the relevant data sources through stronger data matching agreements, leveraging the National Verifier tool as the primary source of verification of enrollment in the Lifeline program would reduce confusion amongst potential participants on how to enroll in the program. However, NDIA advises Congress to recall that a large portion of the potential program applicants lack access to the internet, a device, and/or the digital skills necessary to complete the application. As such, personalized enrollment assistance from CBOs is necessary for many potential applicants. In addition, NDIA urges Congress to require the Commission to retain the use of the paper application for those who have no digital skills and do not know how to use a computer at all.[66]

NDIA recommends creating grant programs designed to streamline the process

[63] Universal Service Administrative Company, "National Verifier Annual Report", January 31, 2025, https://www.usac.org/lifeline/national-verifier/
[64] Universal Service Administrative Company, "National Verifier Annual Report", January 31, 2025, https://www.usac.org/lifeline/national-verifier/
[65] National Digital Inclusion Alliance on the Implementation of the Affordable Connectivity Program (Dec. 9, 2021), https://www.fcc.gov/ecfs/search/search-filings/filing/1031637767104
[66] National Digital Inclusion Alliance on the Implementation of the Affordable Connectivity Program (Dec. 9, 2021), https://www.fcc.gov/ecfs/search/search-filings/filing/1031637767104

of verifying participant eligibility for the new broadband affordability benefit program. The Promoting Access to Broadband Act of 2023 outlines two key grant programs: one focused on affordable connectivity and outreach for Lifeline enrollment, and another aimed at helping states improve the national Lifeline eligibility verification system.[67]

Coordinate and Align USF, FCC, and other Federal Programs with a National Digital Opportunity Plan

NDIA reiterates the need for a National Digital Opportunity Plan. A National Digital Opportunity Plan would enable federal agencies to improve coordination among their digital inclusion and broadband programs, reduce duplication of resources while increasing the impact of individual programs,[68] and serve as a guide to evaluate the effectiveness of Universal Service Fund (USF) programs in the Commission's ongoing work toward achieving its universal service goals for broadband.

5. For any recommendations on reforms, does the Commission currently have the feasibility and authority to make such changes?

The Commission has the authority to modernize reporting, enforce anti-fraud safeguards, streamline administration, and institute speed, affordability, interoperability, cybersecurity, and resiliency requirements for USF programs.[69] However, as we suggest in these comments, updating and expanding the Lifeline program, mandating the development of a national digital opportunity plan, establishing a national digital opportunity foundation, and broadening the contribution base beyond BIAS, would require Congressional action.

[67] Promoting Access to Broadband Act of 2023, S.3024, 118th Congress § 1 (2023).
[68] United States Government Accountability Office, Broadband: A National Strategy Needed to Coordinate Fragmented, Overlapping Federal Programs (GOA, May 2023), https://www.gao.gov/products/gao-23-106818.
[69]

Additional Comments and Conclusion

Congress should establish a National Digital Opportunity Foundation Funded (in part) by USF

The USF principles Congress established in 1996 are still valid in 2025, but as it has been 30 years since Congress first established them and they have not been fully realized, it's urgent that we achieve them.

To truly advance universal service, we must address all the barriers to digital opportunity–the lack of affordable, robust connectivity, appropriate devices, and digital skills. Doing so requires human intervention. Community-based programs designed to address these barriers can (and do) help their community members overcome them so they can leverage online tools to thrive.

Digital inclusion practitioners and digital navigators serve everyone, from veterans and their families to farmers, small business owners, parents, and children. Some navigator programs provide low-cost, refurbished devices to older adults, children, and others who need them. Some help people connect to the internet and learn the basic skills necessary to access the internet and stay safe online. Others help people understand critical specialized skills, like using the internet to set up a small business. Because digital inclusion practitioners live and work in the communities they serve, they know what these communities need and design programs to meet those needs. As ISPs expand where they serve, navigators also play a crucial role in ensuring people can sign up for internet access.

As technology evolves, how we use it continues to grow, resulting in the continuous need for digital skills training, digital navigation, and technical support. However, a sustainable national source of funds to support these programs doesn't currently exist. The Digital Equity Act would have been a one-time infusion of $2.75 billion to expand these and establish new programs, but the administration canceled it earlier this year.

Congress should establish a national Digital Opportunity Foundation with a percentage of the USF funds to fund digital inclusion initiatives nationwide. The foundation could be housed under the FCC or be an independent entity.

An independent entity is preferable because if it were independent, it would have the ability (and potential mandate) to raise additional funds to minimize the amount of funds required by the USF, be more nimble and able to address challenges that impact the digital divide (like the impacts of AI) in a timely fashion, less responsive to the ever-changing political priorities, and more responsive to the needs of the communities and individuals most impacted by the digital divide.

The Foundation should provide grants to organizations to operate digital opportunity programs that address one or more of the barriers keeping people offline, including digital skills, AI literacy, cybersecurity, the lack of devices, and the lack of one-on-one support to navigate getting and staying online.

The foundation should fund:

- **Direct service programs** that are designed to close the barriers outlined above, (such as digital skills programs, digital navigator programs, device refurbishment and distribution programs, outreach and enrollment efforts for the new Broadband Affordability Benefit Program)
- **Capacity-building programs** that provide resources to organizations and communities to train staff and scale programs
- **Research and evaluation activities** to benchmark progress, refine best practices, and advance the field
- **The development of national resources**, such as digital navigator certification standards, a national resource repository, a data tracking system, and a national digital skills framework, equips programs nationwide for more effective service delivery.

The grants should be multi-year, flexible, and range in size to accommodate the needs of both new and existing programs.

In addition to its grant-making responsibilities, the foundation should raise awareness about the digital divide and best practices for closing it, act as a convener for grantees, practitioners, and thought leaders, and operate as an incubator for emerging solutions.

Congress Should Design a Solution for Increasing Device Access and Ownership

If Congress establishes a National Digital Opportunity Foundation, it can address the significant gaps in device ownership through the foundation's grant programs. However, it should still address the device gaps if it does not establish a foundation. The device program in the Affordable Connectivity Program was neither efficient nor effective. As such, NDIA recommends Congress establish a stand-alone device program such as the device voucher program Senator Warnock introduced via the "Devices for Every American Act" in 2021.[70]

In the program, Congress should require the Commission to establish minimum standards and a schedule for reevaluating and updating those standards. These standards should ensure that devices purchased through the program are sufficient for distance learning, telehealth, remote work, and other modern uses.

Conclusion

Modernizing USF is a complex but essential task. NDIA commends this Working Group for initiating the conversation and commits to engaging the NDIA community of over 2,000 affiliates and providing their on-the-ground perspective to Congress and the FCC as the modernization process continues. We thank you for the opportunity to provide input to the Working Group's deliberations, and we look forward to discussing these recommendations with the Working Group further.

Sincerely,

Angela Siefer, Executive Director

[70] Devices for Every American Act, S.2729, 117th Cong.